

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent, and next friend “SUSAN;” and “MATTHEW,” by guardian, parent, and next friend “MARK;” on behalf of themselves and all those similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United States, in his official capacity, et al.,

Defendants.

Case No. 1:25-cv-244

ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, New Hampshire Indonesian Community Support, League of United Latin American Citizens, and Make the Road New York (“Plaintiffs”) respectfully move this court for an order admitting Stephen Kang to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Mr. Kang is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Mr. Kang to appear before this Court.

2. Mr. Kang is a member in good standing of the bars of California, the U.S. Supreme Court, the U.S. District Court for the District of Columbia, the U.S. District Court for the Central District of California, the U.S. District Court for the Northern District of California, the U.S. District Court for the Southern District of California, the U.S. Court of Appeals for the District of Columbia Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Fifth Circuit, the U.S. Court of Appeals for the Sixth Circuit, and the U.S. Court of Appeals

for the Ninth Circuit; he is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and he has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Mr. Kang *pro hac vice* in the above-captioned case.

4. Defendants, through counsel, assent to this motion.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Grant this Motion for Admission *Pro Hac Vice* of Stephen Kang; and
- B. Grant such other and further relief as may be just and equitable.

Date: June 27, 2025

Respectfully submitted,

/s/ SangYeob Kim
SangYeob Kim (N.H. Bar No. 266657)
Gilles R. Bissonnette (N.H. Bar No. 265393)
Henry R. Klementowicz (N.H. Bar. No. 21177)
Chelsea Eddy (N.H. Bar No. 276248)
AMERICAN CIVIL LIBERTIES UNION OF NEW
HAMPSHIRE FOUNDATION
18 Low Avenue
Concord, NH 03301
Tel. 603.224.5591
sangyeob@aclu-nh.org
gilles@aclu-nh.org
henry@aclu-nh.org
chelsea@aclu-nh.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned certifies that he has electronically filed this date the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. This filing is available for viewing and downloading from the ECF system.

Date: June 27, 2025

/s/ SangYeob Kim
SangYeob Kim